

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ASHLEY ALBERT, et al.,

Plaintiffs,

vs.

GLOBAL TEL*LINK CORP., et al.,

Defendants.

Civil Action No. 8:20-cv-01936

**JOINT DECLARATION OF MATTHEW
K. HANDLEY, GEORGE F. FARAH,
BENJAMIN D. BROWN, AND ROBERT
A. BRAUN IN SUPPORT OF
PLAINTIFFS' MOTION TO AMEND**

We, Matthew K. Handley, George F. Farah, Benjamin D. Brown, and Robert A. Braun, declare as follows:

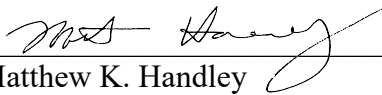
1. We are partners with the law firms of Handley Farah & Anderson PLLC (George Farah and Matthew Handley) and Cohen Milstein Sellers & Toll PLLC (Benjamin Brown and Robert Braun) representing the Plaintiffs in this action.


2. We all attended the October 6, 2020 telephonic conference before the Honorable United States District Judge Paul W. Grimm concerning Defendants' September 18, 2020 pre-motion letter regarding their anticipated motion to dismiss.

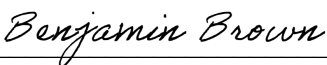
3. As we recall, Judge Grimm asked Plaintiffs at that conference whether they planned to amend their Complaint in response to Defendants' motion to dismiss. We also recall that Judge Grimm informed the parties that it would be inefficient for Defendants to submit a lengthy motion to dismiss brief if Plaintiffs intended to respond to that motion by amending their complaint. However, we do not recall Judge Grimm ever stating that if Plaintiffs declined to amend in response to Defendants' pre-motion letter, any dismissal of Plaintiffs' claims would be with prejudice.


4. We certify under penalty of perjury that the foregoing is true and correct to the best of our knowledge.

Executed on December 16, 2021


Matthew K. Handley


George F. Farah


Benjamin D. Brown


Robert A. Braun